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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

UNITED STATES OF AMERICA  
ex rel. PEGGY THORNTON, Relator,

and

PEGGY THORNTON,

Plaintiff,

vs.

PORTOLA DEL SOL OPERATOR, LLC,  
a foreign limited-liability company; TMIF  
II PORTOLA, LLC, a foreign limited liability  
company; APARTMENT MANAGEMENT  
CONSULTANTS, LLC, a foreign limited  
liability company, and RENE RICHARDSON,  
as AGENT of PORTOLA DEL SOL  
OPERATOR, LLC,

Defendants.

Case No.: 2:21-cv-01123-APG-BNW

**STIPULATION AND ORDER TO  
EXTEND DEADLINE TO FILE  
RESPONSIVE PLEADING TO SECOND  
AMENDED COMPLAINT**

**[First Request]**

Plaintiff Peggy Thornton (“Thornton”) (collectively “Plaintiff”), Defendant TMIF II Portola, LLC (“TMIF”), by and through their undersigned attorneys, and pursuant to LR IA 6-1, submit the following Stipulation to Extend Time to File Responsive Pleading to the Second Amended Complaint (“SAC”) up to and including October 29, 2024. In support of the Stipulation, the parties state the following:

1. TMIF’s responsive pleading to Plaintiff’s SAC is currently due October 8, 2024.
2. Counsel for TMIF has scheduling conflicts and therefore seeks this extension.

3. Counsel for Plaintiff has agreed to the requested extension and the requested extension will not impact any other deadlines in this case.

4. This is the first request to extend the deadline for TMIF to file their responsive pleading to Plaintiff's SAC.

5. This request for an extension of time is not intended to cause any undue delay or prejudice to any party.

6. Therefore, the Parties hereby stipulate that the deadline for TMIF to file their responsive pleadings shall be extended through October 29, 2024.

Dated this 8<sup>th</sup> day of October, 2024.

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NEVADA LEGAL SERVICES, INC.

By: /s/ Karyna M. Armstrong

By: /s/ Kristopher Pre

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*Attorneys for Plaintiffs*

**IT IS SO ORDERED:**

  
UNITED STATES MAGISTRATE JUDGE

DATED: 10/9/2024